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Via ECF

May 6, 2025

Honorable Lewis J. Liman  
U.S. District Court  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl St.  
New York, NY 10007

Re: *Chan, et al. v. U.S. Dep't of Transp., et al.*, No. 1:23-cv-10365 (LJL); *Mulgrew, et al. v. U.S. Dep't of Transp.*, No. 1:24-CV-01644 (LJL)

Dear Judge Liman,

We are counsel for Plaintiffs in the above-referenced actions. We are in receipt of the Court's Opinion and Order, dated April 17, 2025, dismissing Counts Four and Five of both the *Mulgrew* and *Chan* Plaintiffs' Complaints without prejudice and giving the *Mulgrew* and *Chan* Plaintiffs thirty days to amend their Complaints. Consistent with the extension previously granted to the Trucking Association of New York ("TANY") in the related *Trucking Association of New York v. Metropolitan Transportation Authority, et al.*, 24-cv-04111-LJL matter (ECF No. 106), we write to respectfully request a similar extension, which would permit the *Mulgrew* and *Chan* Plaintiffs to amend their respective Complaints on or before June 16, 2025. Extending the date to amend would give Plaintiffs needed time to consider next steps in these litigations and would align the relevant deadlines for these related Congestion Pricing matters.

We thank the Court for its consideration.

Respectfully submitted,

/s/ Alan M. Klinger

Alan M. Klinger

*Attorney for Plaintiffs*